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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE KLA-TENCOR CORP. SECURITIES
LITIGATION

) Master File No. 06-cv-04065-MJJ

) CLASS ACTION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

) **STIPULATION AND ~~PROPOSED~~**
) **ORDER EXTENDING TIME TO FILE**
) **CONSOLIDATED CLASS ACTION**
) **COMPLAINT AND SETTING BRIEFING**
) **SCHEDULE FOR RESPONSIVE**
) **MOTIONS**

Co-Lead Plaintiffs Police and Fire Retirement System of the City of Detroit ("PFRS")
(formerly known as the Policemen and Firemen Retirement System of the City of Detroit), the
Louisiana Municipal Police Employees' Retirement System ("MPERS") and The City of

[06-CV-04065-MJJ] STIPULATION AND [PROPOSED] ORDER RE CONSOLIDATED
CLASS ACTION COMPLAINT AND BRIEFING ON MOTION TO DISMISS

1 Philadelphia Board of Pensions and Retirement (“CPBPR”), and defendants KLA-Tencor
2 Corporation (“KLA-Tencor” or “the Company”), Edward W. Barnholt, H. Raymond Bingham,
3 Robert T. Bond, Richard J. Elkus, Jr., Jeffrey Hall, Stephen P. Kaufman, John H. Kispert, Kenneth
4 Levy, Kenneth L. Schroeder, Jon D. Tompkins and Lida Urbanek (“Defendants”), by and through
5 their respective counsel hereby recite and stipulate, subject to court approval, as follows
6 concerning modification of the briefing schedule:

7 **RECITALS**

8 WHEREAS, on December 8, 2006, the parties agreed to a stipulation providing for the
9 filing of the consolidated class action complaint (“Consolidated Complaint”) 21 days after the
10 Company filed its restatement and setting a briefing schedule on the motion(s) to dismiss;

11 WHEREAS the Court entered an order on December 13, 2006, approving the parties’
12 stipulation;

13 WHEREAS, on January 29, 2007, the Company issued its annual report on Form 10-K for
14 the period ended June 30, 2006 (“2006 Form 10-K”) wherein it restated its previously filed
15 financial statements for fiscal years ending June 30, 2005 and 2004 and selected consolidated
16 financial data for fiscal years ending June 30, 2005, 2004, 2003 and 2002. The 2006 Form 10-K is
17 170 pages in length.

18 WHEREAS because of the complexity of the restatement, Co-Lead Plaintiffs request an
19 extension of 14 days to file the Consolidated Complaint.

20 WHEREAS defendants agree to Co-Lead Plaintiffs’ request for an extension and, for
21 resulting scheduling reasons, request 21 days instead of 15 days to file their reply.

22 WHEREAS, subject to court approval, the parties have agreed that Co-Lead Plaintiffs may
23 file and serve the Consolidated Complaint on March 6, 2007; that Defendants may file and serve
24 their responsive pleading(s) or motion(s) within 45 days of the filing of the Consolidated
25 Complaint or no later than April 20, 2007; that Co-Lead Plaintiff shall file serve its opposition
26

27
28 [06-CV-04065-MJJ] STIPULATION AND [PROPOSED] ORDER RE CONSOLIDATED
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brief(s) to any such motion(s) within 45 days after the filing of Defendants' responsive pleadings or no later than June 4, 2007; and that Defendants shall file and serve their reply brief(s) within 21 days after the filing of Co-Lead Plaintiffs' opposition brief(s) or no later than June 25, 2007.

STIPULATION

Now, therefore, the parties agree and stipulate, subject to Court approval, as follows:

1. Co-Lead Plaintiffs shall file and serve the Consolidated Complaint no later than March 6, 2007.

2. Defendants shall file and serve their responsive pleading(s) or motions within 45 days after the filing of the Consolidated Complaint or no later than April 20, 2007.

3. Co-Lead Plaintiffs shall file and serve their opposition brief(s) within 45 days after the filing of Defendants' responsive pleading(s) or motions or no later than June 4, 2007.

4. Defendants shall file and serve their reply briefs within 21 days after the filing of Co-Lead Plaintiffs' opposition brief(s) or no later than June 25, 2007.

DATED: February 12, 2007

**BERMAN DEVALERIO PEASE TABACCO
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By: /s/ Nicole Lavallee
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CLASS ACTION COMPLAINT AND BRIEFING ON MOTION TO DISMISS

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Plaintiffs' Executive Committee

E-Filing Attestation

I, Nicole Lavallee, am the ECF User whose ID and password are being used to file this document. In compliance with General Order 45 X.B., I hereby attest that each of the signatories identified below has concurred in this filing.

DATED: February 12, 2007

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DATED: February 12, 2007

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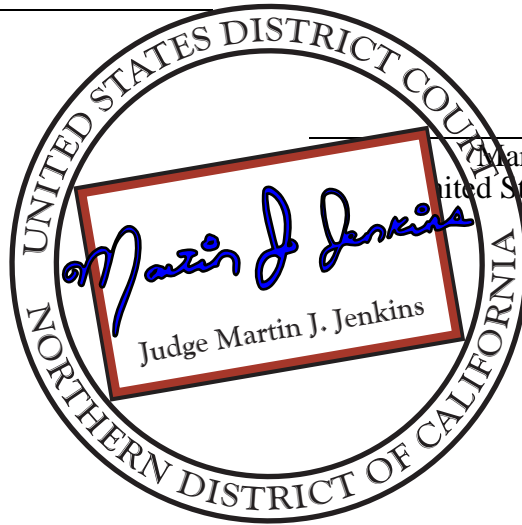
[06-CV-04065-MJJ] STIPULATION AND [PROPOSED] ORDER RE CONSOLIDATED
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ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

1. Co-Lead Plaintiffs shall file and serve the Consolidated Complaint no later than March 6, 2007.
2. Defendants shall file and serve their responsive pleading(s) or motions within 45 days of the filing of the consolidated class action complaint or no later than April 20, 2007.
3. Co-Lead Plaintiffs shall file and serve their opposition brief(s) within 45 days of the filing of Defendants' responsive pleading(s) or motions or no later than June 4, 2007.
4. Defendants shall file and serve their reply briefs within 21 days of the filing of Co-Lead Plaintiffs' opposition brief(s) or no later than June 25, 2007.

DATED: 02/20/07



Martin J. Jenkins
United States District Judge